

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

|                                    |   |                              |
|------------------------------------|---|------------------------------|
| <b>ERNEST N. FINLEY, JR.</b>       | ) |                              |
|                                    | ) |                              |
| <b>Plaintiff,</b>                  | ) | <b>CIVIL ACTION NUMBER</b>   |
|                                    | ) | <b>2:23-CV-00146-KKD-PBM</b> |
| <b>v.</b>                          | ) |                              |
|                                    | ) |                              |
| <b>CITY OF MONTGOMERY, et al.,</b> | ) |                              |
|                                    | ) |                              |
| <b>Defendants.</b>                 | ) |                              |

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**MOTION TO WITHDRAW PURSUANT TO ALABAMA RULES of  
PROFESSIONAL CONDUCT 1.16 (a) (2)**

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COMES NOW Alicia K. Haynes and moves this Honorable Court to withdraw from representation in this matter, pursuant to Rule 1.16 (a)(2) of the Alabama Rules of Professional Conduct.

The undersigned has communicated the need to withdraw with the client consistent with Rule 1.4 (b) of the Alabama Rules of Professional Conduct and Plaintiff consents to the withdrawal. Plaintiff will be represented by Kenneth D. Haynes until Plaintiff secures additional or alternate counsel.

WHEREFORE, movant respectfully requests that the Court grant her leave to withdraw as counsel of record for Plaintiff.

Respectfully Submitted,

/s/ Alicia K. Haynes

Alicia K. Haynes

**OF COUNSEL:**

Alicia K. Haynes

Kenneth D. Haynes

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Alicia K. Haynes  
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